

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

| | | |
|---------------------------|---|---------------------|
| UNITED STATES OF AMERICA, |) | |
| |) | |
| Petitioner, |) | |
| |) | |
| V. |) | M.B.D. No. 17-91373 |
| |) | |
| DAVID A. JOHNSTON, |) | |
| |) | |
| Respondent. |) | |

ORDER TO SHOW CAUSE

Upon the Petition, the Exhibit(s) attached thereto, including the Declaration of Seth R. Grossman, Revenue Officer of the Internal Revenue Service, and upon the motion of William D. Weinreb, Acting United States Attorney for the District of Massachusetts, it is

ORDERED that the respondent appear before the District Court of the United States for the District of Massachusetts, in that branch thereof presided over by the undersigned, in courtroom # 22 in the United States District Courthouse in Boston on the 17 day of January, 2018, at 2 PM, to show cause why he should not be compelled to obey the Internal Revenue Service Summons served upon him on May 11, 2017. It is further

ORDERED that the United States Marshal or, alternatively, any agent, Revenue Officer, or other person designated by the Internal Revenue Service serve a copy of this Order, together with the Petition and Exhibit(s) thereto, personally upon David A. Johnston on or before January 3, 2018.

ORDERED that within five days of service of copies of this Order, the Petition and Exhibit(s), the respondent shall file and serve a written response to the Petition.

Dated at Boston, Massachusetts on this 14 day of November, 2017.

/s/ George A. O'Toole, Jr.

UNITED STATES DISTRICT JUDGE